UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 West 15th St., Suite 3200
HELENA, MONTANA 59626

Ref: 8MO

April 20, 2010

Mary C. Erickson, Supervisor
Gallatin National Forest
10 East Babcock Street
P.O. Box 130
Bozeman, MT 59771

Re: CEQ 20100091; Bozeman Municipal Watershed Project Final EIS and ROD

Dear Ms. Erickson:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Bozeman Municipal Watershed Project in accordance with EPA responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to EPA and other agency and public comments on the DEIS. A new preferred alternative, Alternative 6, has been disclosed in the FEIS/ROD involving reduced helicopter logging inside the Gallatin Fringe Inventoried Roadless Area (IRA), and increased prescribed burning. The new Alternative 6 includes approximately 1575 acres of burning in less dense stands; mechanical cutting/piling of young trees on 1,100 acres; and partial harvesting on 2060 acres, with use of 37% ground based harvest, 24% skyline and 39% helicopter harvest to implement this thinning. In addition a small increase in temporary road construction is included in Alternative 6 (i.e., 7.1 miles vs. 6.9 miles of temporary road in Alternative 5), and 3.1 miles of old road re-opened. Approximately 200 acres of the partial harvesting would occur in the Gallatin Fringe IRA, but helicopter harvesting would occur and no roads would be built in the IRA. Proposed activities would be carried out over an approximate 5-12 year timeframe.

The EPA remains supportive of the Bozeman Municipal Watershed Project purpose and need to reduce hazardous fuels and fire risk/severity in the municipal watershed to reduce the risk of excess sediment and ash reaching the municipal water treatment plant, as well as to reduce fire risk/severity to the wildland urban interface (WUI), and increase firefighter and public safety in the event of a wildfire. EPA recognizes that land management decisions involve environmental and resource management trade-offs (i.e., trade-offs in impacts among vegetation treatments, fire and fuels, water quality and aquatics, wildlife, and other resource impacts). The Gallatin National Forest appears to have considered the long term trade-offs associated with potentially severe wildfire and high sediment increase risk compared to the vegetation

management activities of this proposal and possible short-term increases in sediment to the City of Bozeman water treatment plant.

We are pleased that the preferred alternative includes project changes and mitigation to reduce the potential sediment yields to within standards. We especially support the Gallatin NF plans to decommission approximately 10-15 miles of project roads in the Hyalite drainage as well as stabilize cut slopes along the Hyalite Road #62, and to improve drainage and maintenance of roads in the project area. We note that it is important that the Forest Service assure that adequate funding is provided to carry out this road decommissioning and maintenance, since it is known that prolonged under-funding of road maintenance on National Forests has resulted in degraded road conditions, and that there is a significant backlog of road maintenance needs on National Forests (Source: *"Rightsizing" the Forest Service Road System Part 1: Road Trend Analysis,* March 22, 2007).

It is our understanding that at least one formal review of BMPs will occur during project implementation, and that water quality impacts of proposed fuel reduction activities will be evaluated from water quality monitoring carried out by the City of Bozeman in accordance with their Water Facility Plan. We are pleased that the Gallatin NF participates and coordinates with EPA and Montana DEQ staff in preparation and implementation of Total Daily Maximum Loads (TMDL's) for both the East Gallatin TMDL (Bozeman Creek) and Lower Gallatin TMDL (Hyalite Creek).

Finally as we noted in our DEIS comments, large diameter trees are generally long lived and more fire resistant, and provide important wildlife habitat. Harvest of large fire resistant trees could potentially increase fire risk by opening up the canopy and promoting more vigorous growth of underbrush/small trees that would increase fuels and fire risk in subsequent years, contrary to the hazardous fuel and fire risk reduction purpose and need. We recommend that the largest, best formed and least insect damaged trees be retained as much as possible. Although we recognize that there may be site-specific circumstances that may require removal of individual large trees if they pose safety hazards or need to be removed for insect infestation or access (e.g., along a skid trail, although we believe skid trail layout should avoid such large at risk trees if possible).

The EPA appreciates the opportunity to review and comment during the EIS process. If you have any questions regarding our input please contact Mr. Steve Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,

Julie A. DalSoglio
Director
Montana Office

cc: Larry Svoboda/Connie Collins, EPA, 8EPR-N, Denver
Mark Kelley/Robert Ray, MDEQ, Helena